

**FILED**

APR 23 2008

**Board of Vocational Nursing  
and Psychiatric Technicians**

EDMUND G. BROWN JR., Attorney General  
of the State of California  
LINDA K. SCHNEIDER  
Supervising Deputy Attorney General  
ANTOINETTE CINCOTTA, State Bar Number 120482  
Deputy Attorney General  
California Department of Justice  
110 West "A" Street, Suite 1100  
San Diego, CA 92101

P.O. Box 85266  
San Diego, CA 92186-5266  
Telephone: (619) 645-2095  
Facsimile: (619) 645-2061

Attorneys for Complainant

**BEFORE THE  
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2004-2251

**JENNIE MUNCH, AKA  
JENNIE STANFIELD, AKA  
JENNIE LEIGH STANFIELD, AKA  
JENNIE LEIGH HIATT**  
28348 Adrienne Street  
Murrieta, CA 92563

**ACCUSATION**

Vocational Nurse License No. VN 201392

Respondent.

Complainant alleges:

**PARTIES**

1. Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") brings this  
Accusation solely in her official capacity as the Executive Officer of the Board of Vocational  
Nursing and Psychiatric Technicians ("Board"), Department of Consumer Affairs.

2. On or about October 10, 2002, the Board issued Vocational Nurse License  
Number VN 201392 to Jennie Munch, also known as Jennie Stanfield, Jennie Leigh Stanfield,  
and Jennie Leigh Hiatt ("Respondent"). The vocational nurse license will expire on April 30,  
2010, unless renewed.

## STATUTORY PROVISIONS

3. Section 2875 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline the holder of a vocational nurse license for any reason provided in Article 3 (commencing with section 2875) of the Vocational Nursing Practice Act.

4. Section 118, subdivision (b), of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated. Under section 2892.1 of the Code, the Board may renew an expired license at any time within four years after the expiration.

5. Section 2878 of the Code states, in pertinent part:

The Board may suspend or revoke a license issued under this chapter [the Vocational Nursing Practice Act (Bus. & Prof. Code, § 2840, et seq.)] for any of the following:

(a) Unprofessional conduct. . .

(j) The commission of any act involving dishonesty, when that action is related to the duties and functions of the licensee.

6. Section 2878.5 of the Code states, in pertinent part:

In addition to other acts constituting unprofessional conduct within the meaning of this chapter, it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed physician and surgeon, dentist or podiatrist administer to himself or herself or furnish or administer to another, any controlled substance as defined in Division 10 of the Health and Safety Code, or any dangerous drug as defined in Section 4022.

(b) Use any controlled substance as defined in Division 10 of the Health and Safety Code, or any dangerous drug as defined in Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to himself or herself, any other person, or the public, or to the extent that the use impairs his or her ability to conduct with safety to the public the practice authorized by his or her license.

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1 (e) Falsify, or make grossly incorrect, grossly inconsistent, or  
2 unintelligible entries in any hospital, patient, or other record pertaining to  
narcotics or dangerous drugs as specified in subdivision (b).

3 7. Section 4060 of the Code provides, in pertinent part,

4 No person shall possess any controlled substance, except that furnished to  
5 a person upon the prescription of a physician, dentist, podiatrist, optometrist,  
6 veterinarian, or naturopathic doctor pursuant to Section 3640.7, or furnished  
7 pursuant to a drug order issued by a certified nurse-midwife pursuant to Section  
2746.51, a nurse practitioner pursuant to Section 2836.1, a physician assistant  
8 pursuant to Section 3502.1, a naturopathic doctor pursuant to Section 3640.5, or a  
9 pharmacist pursuant to either subparagraph (D) of paragraph (4) of, or clause (iv)  
of subparagraph (A) of paragraph (5) of, subdivision (a) of Section 4052.

10 8. Section 11173, subdivision (a), of the Health and Safety Code provides:

11 No person shall obtain or attempt to obtain controlled substances, or  
12 procure or attempt to procure the administration of or prescription for controlled  
substances, (1) by fraud, deceit, misrepresentation, or subterfuge; or (2) by the  
concealment of a material fact.

### 13 COST RECOVERY

14 9. Section 125.3 of the Code provides, in pertinent part, that the Board may  
15 request the administrative law judge to direct a licensee found to have committed a violation or  
16 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
17 and enforcement of the case.

### 18 DRUGS

19 10. "**Demerol**" is a brand of meperidine hydrochloride, a derivative of  
20 pethidine, a Schedule II controlled substance as designated by Health and Safety Code section  
21 11055, subdivision (c)(17), and is a dangerous drug within the meaning of Code section 4022, in  
22 that under federal law it requires a prescription.

23 11. "**Vicodin**" is a compound consisting of 5 mg. hydrocodone bitartrate also  
24 known as dihydrocodeinone, and 500 mg. acetaminophen per tablet, a Schedule III controlled  
25 substance as designated by Health and Safety Code section 11056(e)(4), and is a dangerous drug  
26 within the meaning of Code section 4022, in that under federal law it requires a prescription.

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1                   12.    **"Clonazepam"** is a Schedule IV controlled substance as designated by  
2 Health and Safety Code section 11057(d)(7), and is a dangerous drug within the meaning of Code  
3 section 4022, in that under federal law it requires a prescription.

4                   13.    **"Temazepam"** is a Schedule IV controlled substance as designated by  
5 Health and Safety Code section 11057(d)(29), and is a dangerous drug within the meaning of  
6 Code section 4022, in that under federal law it requires a prescription.

7                                   **FIRST CAUSE FOR DISCIPLINE**

8                   (Obtain, Possess and Self-Administer Controlled Substances in Violation of Law)

9                   14.    Respondent's vocational nurse license is subject to discipline under Code  
10 section 2878, subdivision (a), on the grounds of unprofessional conduct, as defined in Code  
11 section 2878.5, subdivision (a), as follows:

12                   a.    On or about October 21, 2006, while employed and on duty as a licensed  
13 vocational nurse at Corona Regional Medical Center in Corona, California, Respondent did the  
14 following:

15                   i.    Respondent obtained Demerol, a controlled substance, by fraud, deceit,  
16 misrepresentation or subterfuge, in violation of Health and Safety Code section 11173,  
17 subdivision (a), by taking the drug from hospital supplies for her own personal use.

18                   ii.   Respondent possessed Demerol, a controlled substance, in violation of  
19 Code section 4060.

20                   iii.   Respondent self-administered Demerol, a controlled substance, without  
21 direction from a licensed physician, surgeon, dentist or podiatrist.

22                   b.    Between June 17, 2005, and June 18, 2005, while employed and on duty as  
23 a licensed vocational nurse at Riverside County Regional Medical Center in Moreno Valley,  
24 California, Respondent did the following:

25                   i.    Respondent obtained Demerol, a controlled substance, by fraud, deceit,  
26 misrepresentation or subterfuge, in violation of Health and Safety Code section 11173,  
27 subdivision (a), by taking the drug from hospital supplies for her own personal use.

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1           ii.     Respondent possessed Demerol, Vicodin, Clonazepam, and Temazepam  
2 controlled substances, in violation of Code section 4060.

3           iii.    Respondent self-administered Demerol, a controlled substance, without  
4 direction from a licensed physician, surgeon, dentist or podiatrist.

5                           **SECOND CAUSE FOR DISCIPLINE**

6                           (Use of a Controlled Substance - Danger to Others)

7           15.     Respondent's vocational nurse license is subject to discipline under Code  
8 section 2878, subdivision (a), on the grounds of unprofessional conduct, as defined in Code  
9 section 2878.5, subdivision (b), in that, on or about October 21, 2006, while working and on duty  
10 as a licensed vocational nurse at Corona Regional Medical Center, Corona, California,  
11 Respondent self-administered Demerol, a controlled substance, to an extent that it impaired her  
12 ability to practice vocational nursing safely.

13                           **THIRD CAUSE FOR DISCIPLINE**

14                           (Commission of Dishonest Acts)

15           16.     Respondent's vocational nurse license is subject to discipline under Code  
16 section 2878, subdivision (j), in that Respondent committed dishonest acts as follows:

17           a.     On or about October 21, 2006, Respondent obtained Demerol, a controlled  
18 substance, by signing it out for patients on sign-out sheets when there was no physician's order  
19 for Demerol for those patients, as more fully set forth in paragraph 17, subparagraphs a through f,  
20 below.

21           b.     Respondent claimed that, while working as a licensed vocational nurse for  
22 SunPlus Home Health Services in Ontario, California, she had visited and treated a patient at his  
23 home on March 13, 2006, March 14, 2006, and March 15, 2006. In fact, the patient was away  
24 from his home during that time.

25           c.     Between June 17, 2006, and June 18, 2006, while working as a licensed  
26 vocational nurse at Riverside County Regional Medical Center in Moreno Valley, California,  
27 Respondent took vials of Demerol from hospital supplies for her own use, as more fully set forth  
28 in paragraph 14, subparagraph (b)(i), above.

#### FOURTH CAUSE FOR DISCIPLINE

(Grossly Inconsistent or Unintelligible Entries in Facility or Patient Records)

17. Respondent's vocational nurse license is subject to disciplinary action under Code section 2878, subdivision (a), on the grounds of unprofessional conduct as defined in Code section 2878.5, subdivision (c), in that on or about October 21, 2006, while working as a licensed vocational nurse at Corona Regional Medical Center, Corona, California, Respondent made grossly incorrect, grossly inconsistent or unintelligible entries in the hospital or patient records as follows:

##### Patient #1

a. On or about October 21, 2006, at 1830 hours, Respondent signed out on the controlled substances sign-out sheet 100 mg of Demerol when there was no physician's order for Demerol for this patient. Respondent failed to chart the administration or wastage of any portion of the Demerol in any patient or hospital record or otherwise account for the disposition of the drug.

##### Patient #2

b. On or about October 21, 2006, at 1340 hours, Respondent signed out on the controlled substances sign-out sheet 100 mg of Demerol when there was no physician's order for Demerol for this patient. Respondent failed to chart the administration or wastage of any portion of the Demerol in any patient or hospital record or otherwise account for the disposition of the drug.

c. On or about October 21, 2006, at 1450 hours, Respondent signed out on the controlled substances sign-out sheet 100 mg of Demerol when there was no physician's order for Demerol for this patient. Respondent failed to chart the administration or wastage of any portion of the Demerol in any patient or hospital record or otherwise account for the disposition of the drug.

d. On or about October 21, 2006, at 1750 hours, Respondent signed out on the controlled substances sign-out sheet 100 mg of Demerol when there was no physician's order for Demerol for this patient. Respondent failed to chart the administration or wastage of any

1 portion of the Demerol in any patient or hospital record or otherwise account for the disposition  
2 of the drug.

3 Patient #3

4 e. On or about October 21, 2006, at 1600 hours, Respondent signed out on  
5 the controlled substances sign-out sheet 100 mg of Demerol when there was no physician's order  
6 for Demerol for this patient. Respondent failed to chart the administration or wastage of any  
7 portion of the Demerol in any patient or hospital record or otherwise account for the disposition  
8 of the drug.

9 f. On or about October 21, 2006, at 1830 hours, Respondent signed out on  
10 the controlled substances sign-out sheet 100 mg of Demerol when there was no physician's order  
11 for Demerol for this patient. Respondent failed to chart the administration or wastage of any  
12 portion of the Demerol in any patient or hospital record or otherwise account for the disposition  
13 of the drug.

14 PRAYER

15 **WHEREFORE**, Complainant requests that a hearing be held on the matters  
16 herein alleged, and that following the hearing, the Board of Vocational Nursing and Psychiatric  
17 Technicians issue a decision:

18 1. Revoking or suspending Vocational Nurse License Number VN 201392,  
19 issued to Jennie Munch, also known as Jennie Stanfield, also known as Jennie Leigh Stanfield  
20 and Jennie Leigh Hiatt;

21 2. Ordering Jennie Munch, also known as Jennie Stanfield, also known as  
22 Jennie Leigh Stanfield and Jennie Leigh Hiatt, to pay the Board of Vocational Nursing and  
23 Psychiatric Technicians the reasonable costs of the investigation and enforcement of this case,  
24 pursuant to Code section 125.3; and,

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3. Taking such other and further action as deemed necessary and proper.

DATED: April 23, 2008

  
TERESA BELLO-JONES, J.D., M.S.N., R.N.  
Executive Officer  
Board of Vocational Nursing and Psychiatric Technicians  
Department of Consumer Affairs  
State of California  
Complainant

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